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WILLIAM A. MUNDELL**Chairman****JAMES M. IRVIN****Commissioner****MARC SPITZER****Commissioner**

Arizona Corporation Commission

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**IN THE MATTER OF U S WEST
COMMUNICATIONS, INC.'S
COMPLIANCE WITH § 271 OF THE
TELECOMMUNICATIONS ACT OF 1996****Docket No. T-00000B-97-0238****AT&T'S COMMENTS ON CGE&Y's
RESPONSES TO ARIZONA
CORPORATION COMMISSION
STAFF'S DATA REQUESTS TO
CONSULTANTS**

AT&T Communications of the Mountain States, Inc. and TCG Phoenix

(collectively, "AT&T") hereby file their comments on the responses provided by Cap Gemini Telecom Media & Networks U.S., Inc. ("CGE&Y") to the July 2, 2002, data requests issued by the Arizona Corporation Commission Staff ("Staff") in this proceeding. AT&T finds the CGE&Y answers to be non-responsive to the Staff's questions, incomplete and misleading and, in several instances, inaccurate. In the following comments AT&T identifies the data request by the Staff's number and provides necessary facts to support its position. CGE&Y should be required to remedy its responses in writing and to provide the full and complete answers in the course of the July 30 and 31 workshop being held to gather input on competitive local exchange carrier ("CLEC") participation in the section 271 OSS test.

A. STAFF 1-1: Please indicate, by each of the five tests performed, whether your test activities were: 1) not dependent upon CLEC input; 2) partially dependent upon CLEC input; or 3) heavily dependent upon CLEC input. Please give a detailed explanation of your response in each instance.

CGE&Y attempts to limit the Staff's inquiry by establishing that it will only respond on the basis of its opinion of how CLEC input was to be received and under what conditions it believes the CLEC input was provided. This is a limitation that is not found in Staff's data requests and one that may deprive the Commission of the information being sought by Staff. CGE&Y shows its intent to limit its response when it defines "CLEC input" as that which would "include only CLEC input required by the design of the test, as provided in the Master Test Plan (MTP) and Test Standards Document (TSD)." It is not clear what parts of the MTP and TSD CGE&Y is using to limit its responses, as it fails to specify which sections, if any, of the MTP or the TSD *require* CLEC input; and it implies that if CLEC input were provided that did not meet its narrow interpretation of the MTP or the TSD, it will not indicate the test activity dependencies. Therefore, as an initial matter, it must cite the specific sections of the MTP and TSD that it is using to limit its answers to the request.

If a CLEC reported an event to CGE&Y in response to a questionnaire or interview question that CGE&Y, relying on its own standard, found not to be required by the MTP or TSD, but may have value in an assessment of the competency of Qwest's OSS, CGE&Y may not have divulged that CLEC input to the Staff. This is wrong and inconsistent with the intent of Staff's data request. The data requests are not implicitly limited by the scope of the MTP and TSD, *as CGE&Y defines it*. In addition, CGE&Y conducted testing that is not described or defined within the MTP or the TSD, for

example, when it conducted Phase I of the Retail Parity Evaluation, testing activities that were performed which resulted in its preparation and publication of the Functionality Test Results Comparison report, the PID Matrix report, and its provisions of Recommendations in its Final Report. None of these are required by the MTP or the TSD, but nonetheless, were tests that CGE&Y conducted that may have been dependent on CLEC input.

Staff did not ask CGE&Y to interpret its data request so as to narrow the information divulged; on the contrary, it made the request to find out what information CGE&Y acquired and to determine the extent to which CGE&Y used the information provided by CLECs.

CGE&Y must identify the specific sections of the MTP and the TSD that it has used to limit its response, and it must make a complete showing of the CLEC input it received and indicate the extent to which it relied on that input in conducting the five tests.

Capacity Test

CGE&Y inaccurately replies to Staff: "The execution of the Capacity Test was not dependent on CLEC input." This flies in the face of its Final Report:

As an entrance criterion to the Capacity Test, a detailed test plan was developed (see Section 5.2.4(a) of the TSD 2.10). A Capacity Subcommittee was formed as a sub-group of the Arizona TAG to deal with the technical issues associated with the Capacity Test and to take into consideration commercial conditions. The *Capacity Subcommittee consisted of participants from ACC, DCI, CGE&Y, HP, Qwest, WorldCom, and AT&T* with occasional representation from other TAG members. Admission to the Subcommittee was open to all TAG members. The System Capacity Test Detailed Plan, Version 2.02, dated July 25, 2001 (SCTDP 2.02), developed by CGE&Y with input from the Capacity Subcommittee, was the

governing document for the execution of the System Capacity Test, which includes the Stress Test.¹

The Capacity Test required CLEC input to develop technical issues and to participate in the preparation of the SCTDP, and CLEC input was provided (although not necessarily adopted). AT&T is a CLEC that actively participated in the Capacity Subcommittee and provided comments on the Detailed Test Plan. CGE&Y should remedy its inaccurate response and provide the information requested by Staff.

Relationship Management Evaluation

CGE&Y asserts facts that are not supported by the record in this proceeding and are not supported by information contained in the CGE&Y Document Viewing Room ("DVR"). It answers:

CLEC input was repeatedly solicited, but due to limited response, the majority of input came from the Pseudo-CLEC supplemented by extensive research by CGE&Y.

In its Final Report at 13, CGE&Y advises that the Commission Staff "established a document viewing room in which CGE&Y and HP placed all appropriate test documentation." Presumably, information that it solicited for the Relationship Management Evaluation would be located in the DVR. There is no record of "repeated" solicitations for CLEC input. In the Relationship Management Evaluation CLEC Questionnaire files, there is no record of repeated circulations of the questionnaires that deal with Account Establishment, Account Maintenance, CLEC Training, EDI Development, or Change Management. CGE&Y should provide any documentation that

¹ Final Report of the Qwest OSS Test, version 3.0, dated May 3, 2002, § 4 (at 262) (emphasis added) ("Final Report"). The TAG consisted of all interested parties, including CLECS. *Id.* at 12.

is in its possession that indicates that its questionnaires were circulated more than once to CLECs.

In the Relationship Management Evaluation Workshop held on October 9, 2001, CGE&Y makes a fuller statement that indicates it did receive input from CLECs and that it relied upon such input for that test.

MR. FINNEGAN: But were the CLECs given the choice of providing solely the questionnaire or were they also given the choice of providing the questionnaire with follow-up interviews?

MR. DRYZGULA: Correspondence that went out with questionnaires gave the option to please call if you wanted to have any further discussion or comment. In addition, *certain CLECs were proactive and approached us and said that they wanted to discuss very specific issues with us, and we did perform very subject-specific conversations with them.*²

Furthermore, CGE&Y should explain the "extensive research" it claims to have conducted. No obvious documentation is provided in the DVR that indicates CGE&Y performed research to fill in any gaps in information that it needed which did not come from the Pseudo-CLEC. Its claim needs to be explained: what was/were the research objective(s); what research materials were used; what was the period of the research; what scientific methods were employed to gather data, analyze the data, and verify the results? There is no statement in the Relationship Management Evaluation section of the Final Report that any of the CGE&Y findings are based on research.

B. STAFF 1-2: Of the evaluations falling into Categories 2 and 3, please provide the name and a brief description of the involvement of CLECs participating in each evaluation. This description should include the nature and extent that the CLEC was involved (e.g. CLEC provided facilities for CGE&Y or HP to use, CLEC actually input service request, etc.).

² TR 105 (emphasis added).

There is no reason Staff should be satisfied with the paucity of information provided by CGE&Y in its response to this response. Staff asked for the nature and extent that CLECs were involved in each of these tests, and CGE&Y provides no such information. It does not claim that it cannot provide it or that it would be a problem to provide it: CGE&Y simply ignores the detail requested by Staff. CGE&Y should be required to provide the necessary information to satisfy Staff 1-2.

Capacity Test

CGE&Y fails to answer Staff's request by indicating "N/A" to this item. As pointed out in the earlier discussion of the CLEC involvement in the Capacity Test, CGE&Y also should remedy its answer here and provide an accounting as requested by Staff.

In the response that it provides, CGE&Y should also identify the occasions upon which it received CLEC input and did not use the information provided by any CLEC in preparing for the Capacity Test, conducting it, or evaluating the results. On several occasions, AT&T provided information to CGE&Y, the other participants of the Capacity Sub-Committee and the TAG for the Capacity Test, and found that its input was ignored by CGE&Y. These include recommendations for modification to the Capacity Test Detailed Plan, recommendations on the proper analysis of pre-order query response times calculated on the basis of actual Pseudo-CLEC results, and analysis of the significant discrepancies between IMA-GUI and EDI query response time intervals.

Functionality Test

In its response to this item, CGE&Y cites to its earlier response to Staff DR 1-1. CGE&Y fails to answer the request fully. CGE&Y should remedy its response and

account for the CLEC input it received. CLECs, including AT&T, provided input to CGE&Y to prepare for the Functionality Test, conducting it, and evaluating the results. These would include the CLEC input provided on March 25, 2001, in which AT&T and WorldCom made specific requests for modifications to the form, format, and content of the pre-order and order daily logs.

CGE&Y's statement, "CGE&Y conducted in-person interviews with Qwest personnel representing the CLEC account establishment, account management, EDI/IMA interface development, and the CICMP processes," is non-responsive to Staff's request. Nothing in the Staff request inquires about information obtained from Qwest that was used by CGE&Y in the test.

Relationship Management Evaluation

CGE&Y claims to have received Relationship Management questionnaire responses from CLECs but they are not in the record in this proceeding and are not contained in the DVR.

Seven questionnaires were received back on account establishment; seven on account management; seven on training; six on interface development – EDI/IMA-GUI; and six on Qwest Co-Provider Industry Change Management Process.

AT&T sent a request to the Arizona TAG when it first received the CGE&Y response to Staff's Data Requests pointing out the significant discrepancy between CGE&Y's response and the DVR file contents. On July 17, AT&T noted:

CGE&Y answers that it received: "Seven questionnaires on account establishment; seven on account management; seven on training; six on interface development - EDI/IMA-GUI; and six on Qwest Co-Provider Industry Change Management Process." Please account for and be prepared to provide copies of the additional questionnaires in CGE&Y's possession in the July 30-31 Workshop. The additional questionnaires are: one account

establishment; one account maintenance; two training; and one on CICMP.

Obviously, AT&T awaits CGE&Y's explanation of how it came up with additional questionnaire responses since it published the Final Report. Moreover, the issue to be fully explained by CGE&Y is the reason that it did not rely upon the additional questionnaire responses that it had in its possession in preparing its Final Report. The reasons for its refusal to take advantage of the "missing" responses must be provided in response to Staff 1-2.

Despite the plain language of Staff's request, CGE&Y fails to provide the names of the CLECs that it met with in the single CLEC Forum meeting that it attended, those who participated via telephone interviews, and those interviewed informally, as noted in the CGE&Y response. CGE&Y is required to provide the names of the CLECs and describe in detail the nature and extent of the CLEC interviews.

C. STAFF 1-3: Of the evaluations falling into Categories 2 and 3, please indicate the efforts of CGE&Y and HP to obtain CLEC involvement where necessary to obtain a balanced and accurate evaluation.

CGE&Y inappropriately limits its view of the applicable evaluations being sought by Staff by insisting that it is providing responses which are "consistent with the requirements of the TSD and MTP and sufficient, in CGE&Y's professional opinion, to make the findings contained in its report." As an initial matter, CGE&Y must cite the specific sections of the MTP and TSD that it is using to limit its answer the request. However, in any event, it cannot be allowed to interpret Staff's request in a way that limits the information that Staff has requested pursuant to a data request.

CGE&Y wants to limit its response to those areas where the information it sought, or that was received, was actually used to develop its findings contained in the OSS test Final Report. It does not provide information that indicates the areas of testing where it sought information from CLECs that would balance its evaluation. It does not provide information on CLEC input that it received that it chose not to use in its evaluation of Qwest's OSS but which, if it had been relied upon, could have created a different evaluation result. If CGE&Y received negative information on Qwest's OSS from a CLEC and chose to ignore it, apparently, it would not provide that information in its response to Staff 1-3 because that information, having been ignored by CGE&Y, was not "sufficient [] to make the findings contained in its report." This is not what Staff asked. The un-used information is as important in this proceeding as is the used information. In fact, this is the basis of Staff's requests.

CGE&Y should be required to identify the MTP and TSD sections that it is using to limit its response. Moreover, CGE&Y should be required to fully disclose its efforts, and the fruits of those efforts, to acquire information from CLECs that would balance its evaluation. Its answers are non-responsive.

Capacity Test

CGE&Y provides no information in response to Staff's request. The Capacity Test required CLEC involvement, as is explained in the above comments on Staff 1-1 and 1-2, and the Staff's question as to the ways in which CLEC input was sought and the ways in which it was used need to be answered.

Functionality Test

CGE&Y provides no information in response to Staff's request. The Functionality Test required CLEC involvement, as is explained in the above comments on Staff 1-1 and 1-2, and the Staff's question as to the ways in which CLEC input was sought and the ways in which it was used need to be answered.

Relationship Management Evaluation

CGE&Y claims that it "... repeatedly made formal requests to obtain CLEC participation" for the Relationship Management Evaluation, but this is in stark contrast to the contents of its DVR in the Relationship Management Evaluation files and is inconsistent with the record on this evaluation, as described further in the above comments on Staff 1-1 and 1-2. CGE&Y should explain, if it can, the efforts it expended to seek CLEC input and should respond to the Staff's request for information as to how that input was used in the Relationship Management Evaluation. General assertions are inadequate.

- D. STAFF 1-4: Of the evaluations falling into Categories 2 and 3, please provide a description of any data or information provided by CLECs that was used in the findings and/or conclusions of the evaluation. Please separately identify each CLEC, the data or information provided by that CLEC, and how it was used or relied upon in any findings and/or conclusions.**

Functionality Test

The CGE&Y response to this item is inconsistent with the record in this proceeding and conflicts with CGE&Y's the Final Report (at 451-452), where CGE&Y summarizes the ways in which it relied upon WorldCom and COVAD in the conduct of this test. Its response is deficient because it fails to provide Staff with the information

requested about the ways in which WorldCom and COVAD data was used in the “findings and/or conclusions of the evaluation.”

Relationship Management Evaluation

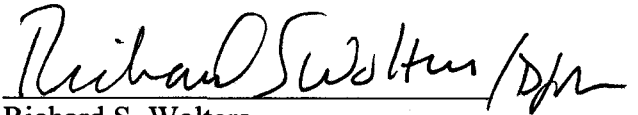
CGE&Y’s statement, “CGE&Y conducted in-person interviews with Qwest personnel representing the CLEC account establishment, account management, EDI/IMA interface development, and the CICMP processes,” is non-responsive to Staff’s request. Nothing in the Staff request seeks information about information obtained from Qwest that was used by CGE&Y in the test.

Despite Staff’s request, CGE&Y fails to provide the names of the CLECs that it met with in the single CLEC Forum meeting that it attended, those who participated via telephone interviews, and those interviewed informally, as noted in the CGE&Y response. CGE&Y must provide the names of the CLECs and describe, in detail, the data or information provided by that CLEC, and how it was used or relied upon in any findings and/or conclusions in the test. CGE&Y has failed to answer the Staff request.

Staff needs to critically evaluate the responses of CGE&Y. The responses are inadequate and do not serve to answer the questions that caused Staff to send the requests in the first place. Staff should require CGE&Y to fully respond to the requests in order to determine if the lack of CLEC input in the test affected the results of the test and the findings and conclusions reached by CGE&Y in its Final Report. CGE&Y has answered the questions in an attempt to justify its findings and conclusions, not to aid Staff in its inquiry. This does a disservice to Staff and ultimately the Commission.

Dated this 24th day of July, 2002.

AT&T Communications of the
Mountain States, Inc.

A handwritten signature in black ink, appearing to read "Richard S. Wolters / djm", written over a horizontal line.

Richard S. Wolters
1875 Lawrence St. Suite 1503
Denver, CO 80202
(303) 298-6741
rwolters@att.com

Gregory H. Hoffman
795 Folsom Street, Suite 2161
San Francisco, CA 94107-1243
(415) 442-3776
greghoffman@att.com

CERTIFICATE OF SERVICE

I hereby certify that the original and 10 copies of **AT&T's Comments on CGE&Y's Responses to Arizona Corporation Commission Staff's Data Requests to Consultants**, Docket No. T-00000B-97-0238, were sent by overnight delivery on July 24, 2002 to:

Arizona Corporation Commission
Docket Control – Utilities Division
1200 West Washington Street
Phoenix, AZ 85007

and a true and correct copy was sent by overnight delivery on July 24, 2002 to:

Maureen Scott
Legal Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

Mark A. DiNunzio
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

Ernest Johnson
Director - Utilities Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

Christopher Kempley
Arizona Corporation Commission
Legal Division
1200 West Washington Street
Phoenix, AZ 85007

Jane Rodda
Administrative Law Judge
Arizona Corporation Commission
400 West Congress
Tucson, AZ 85701-1347

and a true and correct copy was sent by U. S. Mail on July 24, 2002 to:

Thomas F. Dixon
WorldCom, Inc.
707 – 17th Street, #3900
Denver, CO 80202

Terry Tan
WorldCom, Inc.
201 Spear Street, 9th Floor
San Francisco, CA 94015

K. Megan Doberneck
Covad Communications Company
7901 Lowry Blvd.
Denver, CO 80230

Bradley Carroll
Cox Arizona Telcom, L.L.C.
20401 North 29th Avenue
Phoenix, AZ 85027-3148

Michael M. Grant
Gallagher and Kennedy
2575 East Camelback Road
Phoenix, AZ 85016-9225

Gena Doyscher
Global Crossing Local Services, Inc.
1221 Nicollet Mall, Suite 300
Minneapolis MN 55403

Traci Kirkpatrick
Davis Wright Tremaine LLP
1300 S.W. Fifth Avenue
Portland, OR 97201

Michael W. Patten
Roshka Heyman & DeWulf, PLC
400 North Fifth Street, Suite 1000
Phoenix, AZ 85004-3906

Joyce Hundley
United States Dept. of Justice
Antitrust Division
1401 H Street NW, Suite 8000
Washington, DC 20530

Daniel Pozefsky
Residential Utility Consumer Office
2828 North Central Ave., #1200
Phoenix, AZ 85004

Mark N. Rogers
Excell Agent Services, L.L.C.
2175 W. 14th Street
Tempe, AZ 85281

Mark P. Trinchero
Davis Wright Tremaine
1300 SW Fifth Ave., Suite 2300
Portland OR 97201-5682

Penny Bewick
New Edge Networks
3000 Columbia House Blvd., Suite 106
Vancouver, WA 98661

Andrea P. Harris
Senior Manager, Regulatory
Allegiance Telecom, Inc.
2101 Webster, Suite 1580
Oakland, CA 94612

Karen L. Clauson
Eschelon Telecom, Inc.
730 2nd Avenue South, Suite 1200
Minneapolis, MN 55402

Joan S. Burke
Osborn Maledon, P.A.
2929 N. Central Avenue, 21st Floor
Phoenix, AZ 85067-6379

Eric S. Heath
Sprint Communications Company L.P.
100 Spear Street, Suite 930
San Francisco, CA 94105

Charles Kallenbach
American Communications Services, Inc.
131 National Business Parkway
Annapolis Junction, MD 20701

Jeffrey W. Crockett
Snell & Wilmer, LLP
One Arizona Center
Phoenix, AZ 85004-0001

Todd C. Wiley
Gallagher & Kennedy, P.A.
2575 East Camelback Road
Phoenix, AZ 85016-9225

Michael B. Hazzard
Kelley, Drye & Warren, LLP
1200 19th Street, NW, Fifth Floor
Washington, DC 20036

Daniel Waggoner
Davis Wright Tremaine
2600 Century Square
1501 Fourth Avenue
Seattle, WA 98101-1688

Timothy Berg
Fennemore Craig, P.C.
3003 North Central Ave., #2600
Phoenix, AZ 85012

Raymond S. Heyman
Randall H. Warner
Roshka Heyman & DeWulf
Two Arizona Center
400 N. Fifth Street, Suite 1000
Phoenix, AZ 85004

Diane Bacon, Legislative Director
Communications Workers of America
Arizona State Council
District 7 AFL-CIO, CLC
5818 N. 7th Street, Suite 206
Phoenix, AZ 85014-5811

Andrew Crain
Qwest Corporation
1801 California Street, Suite 4900
Denver, CO 80202

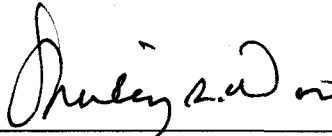
Janet Livengood
Regional Vice President
Z-Tel Communications, Inc.
601 S. Harbour Island Blvd., Suite 220
Tampa, FL 33602

Charles W. Steese
Qwest Corporation
1801 California Street, Suite 4900
Denver, CO 80202

Bill Haas
Richard Lipman
McLeodUSA Telecommunications
Services, Inc.
6400 C Street SW
Cedar Rapids, IA 54206-3177

Brian Thomas
Vice President – Regulatory
Time Warner Telecom, Inc.
520 S.W. 6th Avenue, Suite 300
Portland, OR 97204

Executed on July 24, 2002 in San Francisco, California.



Shirley S. Woo